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Attorney for Defendant
Luke Burroughs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL STEWART
LUKE BURROUGHS,

Defendants.

CASE NO. 2:20-CR-0194 MCE

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: September 23, 2021

TIME: 10:00 a.m.

COURT: Hon. Morrison C. England, Jr.

STIPULATION

1. By previous order, this matter was set for status on September 23, 2021.
2. By this stipulation, defendants now move to continue the status conference until December 9, 2021, and to exclude time between September 23, 2021, and December 9, 2021, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery associated with this case that includes 12,793 Bates numbered documents. This includes bank records; memoranda of interviews, audio recordings, and video recordings. The government has also provided forensic images of electronic devices to the defense.
 - b) Counsel for defendants desire additional time to review the discovery for this matter, conduct investigation and research related to the charges, and to consult with their

1 clients.

2 c) Counsel for defendants believe that failure to grant the above-requested
3 continuance would deny counsel the reasonable time necessary for effective preparation, taking
4 into account the exercise of due diligence.

5 d) The government does not object to the continuance.

6 e) Based on the above-stated findings, the ends of justice served by continuing the
7 case as requested outweigh the interest of the public and the defendant in a trial within the
8 original date prescribed by the Speedy Trial Act.

9 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
10 et seq., within which trial must commence, the time period of September 23, 2021 to December
11 9, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
12 Code T4] because it results from a continuance granted by the Court at defendants' request on
13 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
14 best interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 20, 2021

PHILLIP A. TALBERT
ACTING UNITED STATES
ATTORNEY

/s/ JUSTIN LEE
JUSTIN LEE
Assistant United States Attorney

Dated: September 20, 2021

/s/ DAVID D. FISCHER
DAVID D. FISCHER
Counsel for Defendant
Daniel Stewart


Dated: September 20, 2021

/s/ CANDICE L. FIELDS
CANDICE L. FIELDS
Counsel for Defendant
Luke Burroughs

ORDER

IT IS SO ORDERED.

Dated: September 21, 2021



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE